## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

THE CITY OF HUNTINGTON,

Plaintiff,

v. Civil Action No. 3:17-01362 Hon. David A. Faber

AMERISOURCEBERGEN DRUG CORPORATION, et al.

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

v. Civil Action No. 3:17-01665 Hon, David A, Faber

AMERISOURCEBERGEN DRUG CORPORATION, et al.

Defendants.

## NOTICE OF REMOTE DEPOSITION OF ANNA LEMBKE, M.D.

Defendant Cardinal Health, Inc., by and through counsel, hereby gives notice that the remote, oral deposition of Anna Lembke, M.D., will take place on September 17, 2020, beginning at 10:30 a.m. Eastern Time. The deposition shall be videotaped and recorded stenographically and will be conducted before a notary public or other person authorized to administer oaths. Court reporting services and video recording services will be provided by Veritext Legal Solutions (216-523-1313; opioid@veritext.com), who will provide remote access for all parties wishing to participate via video conference or telephone.

PLEASE TAKE FURTHER NOTICE that the Deponent must have access to a laptop, computer, or tablet with web camera capability. Deponent may not use a cell phone to provide testimony. Deponent must also have the capability to view documents electronically. To the extent Deponent is not in possession of the required technology, documents shall be provided to the

Deponent in hard copy and/or Deponent's counsel shall provide the required technology.

Recommended Specifications are below:

i. Computer

ii. Web Camera

iii. Internet Browser (Google Chrome Preferred)

iv. Minimum 10 mb/s wired, secure internet connection

At minimum, Deponent must have sufficient internet connectivity and bandwidth to support

a video deposition. Such capacity shall be sufficient to ensure that when used with the system

selected for the deposition, there shall be (a) high-quality video upload (from Deponent) and

download (to other Participants), (b) no material time discrepancy between audio and video, and (c)

consistent connectivity, with no material disruptions.

Dated: September 15, 2020

Respectfully submitted,

/s/ Steven R. Ruby

Michael W. Carey (WVSB No. 635)

Steven R. Ruby (WVSB No. 10752)

David R. Pogue (WWVSB No. 10806)

Raymond S. Franks II (WVSB No. 6523)

CAREY DOUGLAS KESSLER & RUBY PLLC

901 Chase Tower, 707 Virginia Street, East

P.O. Box 913

Charleston, WV 25323

Telephone: (304) 345-1234

Facsimile: (304) 342-1105

mwcarey@csdlawfirm.com

sruby@cdkrlaw.com

drpogue@csdlawfirm.com

rfranks@cdkrlaw.com

Counsel for Cardinal Health, Inc.

2

Enu Mainigi F. Lane Heard III Ashley W. Hardin Jennifer G. Wicht WILLIAMS & CONNOLLY LLP 725 Twelfth Street NW Washington, DC 20005 Telephone: (202) 434-5000 Facsimile: (202) 434-5029

emainigi@wc.com lheard@wc.com ahardin@wc.com jwicht@wc.com

Counsel for Cardinal Health, Inc.

**CERTIFICATE OF SERVICE** 

The undersigned hereby certifies that on this 15th day of September, 2020, the foregoing

"Notice of Remote Deposition of Anna Lembke, M.D." was served using the Court's CM/ECF

system, which will send notification of such filing to all counsel of record, and via electronic mail

to mdl2804discovery@motleyrice.com and track2opioiddefendants@reedsmith.com.

Dated: September 15, 2020

/s/ Steven R. Ruby

Steven R. Ruby (WVSB No. 10752)